

TSCA Section 6 Proposed Rule: Paint Removers

Pre-Panel Outreach Potential SER Questions for Discussion

These are informal questions that aim to guide discussion on your work practices and your experiences with these chemicals. We are not seeking a structured response on each question; rather, we are interested in any feedback or details you can provide, and hope that these questions let you know what type of information would be most useful as we consider advice from the small entity representatives.

If you are interested in providing this or other information in writing, please see the contact information at the end.

For manufacturers, processors, product formulators, and distributors:

- 1) General questions related to paint removal:
 - a. Who are your customers? (large businesses, small businesses, consumers, retailers)
 - b. What are your products used for (specific substrates, specific coatings)?
 - c. Do your customers tend to look for specific chemicals in paint removers, or do they prefer use brand names or product names?
 - d. Do you sell other devices related to paint removal (such as sanders, blasters, personal protective equipment)?
- 2) Methylene chloride and NMP in your business:
 - a. What percent of your business is paint removers?
 - i. Of that, what percent contain methylene chloride?
 - ii. Of that, what percent contain NMP?
 - b. Have you had any worker incidents, accidents, or complaints related to paint removers containing these chemicals? If yes, can you elaborate or provide some examples?
 - c. Do you sell paint removers containing alternative chemicals to methylene chloride & NMP?
 - i. What feedback have you received from your customers about them?
 - ii. Specifically, have customers said anything related to effectiveness, wait time for paint removal, or impacts on the substrate?
 - d. What are the current and best practices in your company to reduce environmental releases of processing methylene chloride?
 - i. How do you manage emissions and waste disposal?
- 3) General questions related to proposed regulatory options:
 - a. How frequently do you reformulate your products?
 - b. Are the cost estimates for reformulation accurate?
 - c. How long does the reformulation process typically take?
 - d. Can you think of ways to add flexibility to this rulemaking for your small business?

For all users of paint removers (all industries):

- 4) Current work practices related to paint removal:
 - a. How often do you conduct paint or coating removal? (daily, weekly, etc)
 - i. Do you typically use chemical or mechanical means to remove paint? (sanding, heat gun, blasting, other)?
 - ii. What factors into your decision whether to use chemical or mechanical methods of paint removal?
 - b. How significant is paint or coating removal to your business overall?
 - c. Coatings:
 - i. What type of coatings do you most frequently remove?
 - ii. How many layers of coating do you most frequently remove?
 - iii. Do any particular coatings or substrates present special challenges for removal?
 - d. How does the time to remove paint vary by method or chemical used?
 - e. Do you tend to look for specific chemicals in your paint removers, or do you prefer to look for brand names or product names?
 - i. How do you know which chemicals are in the products you are using?
 - ii. What are trusted sources of information for you about products or chemicals used in your business?
 - f. What do you feel is the most important factor in paint removal: client preference, dwell time, ease of removing the coating, impact on the substrate, price of materials, worker safety, total job time, or other factors?
- 5) Using methylene chloride or NMP in your business:
 - a. How is methylene chloride or NMP currently used in your business?
 - i. How often do you use methylene chloride? In what context?
 - ii. How much methylene chloride does your business use in a typical year?
 - iii. How often do you use NMP? In what context?
 - iv. How much NMP does your business use in a typical year?
 - v. Do you use NMP as a substitute for methylene chloride?
 - vi. What quantities do you purchase? (gallon containers, 55-gallon drums, etc.) Would a requirement to purchase material in a 55-gallon drum significantly affect your business?
 - vii. Where/how do you purchase these products (distributor/direct sales, store, etc)?
 - viii. How much do product labels (particularly hazard labels on products) inform your use of the paint remover?
 - b. If paint removers containing methylene chloride or NMP were not available, what would the impacts be on your business?
 - c. What are the benefits to your business of using methylene chloride or NMP?
 - d. What are the challenges to your business of using methylene chloride or NMP?
 - e. We have heard that many businesses involved in repainting or refinishing aircraft, marinecraft, bathtubs, and cars are moving away from using methylene chloride in paint removal. In your experience, is this correct?
- 6) Exposure reduction for workers

- a. What are your experiences with:
 - i. Installing or updating ventilation and local exhaust
 - ii. Installing or operating other engineering controls
 - iii. Equipment changes to reduce exposures
 - iv. Monitoring worker exposures to chemicals in the air
 - v. Air-supplied respirators
 - vi. Specialized gloves (such as Silver Shield)
 - vii. Other personal protective equipment
 - viii. Worker training to reduce exposures
 - b. If you have changed or updated your exposure reduction technology or methods, how long did that process take?
 - c. What do you do to comply with OSHA standards for methylene chloride?
 - d. What do you currently do to reduce environmental releases of methylene chloride? How do you manage emissions and waste disposal?
 - e. Have you had any worker incidents, accidents, or complaints related to paint removal?
 - i. Do you have concerns about worker exposure to methylene chloride?
 - ii. What do you do to address worker risks or concerns for chemical exposures, and specifically for methylene chloride?
 - f. Have you received any customer feedback about methylene chloride use?
 - g. Do you have concerns about worker exposure to NMP?
 - i. What do you do to address worker risks or concerns for chemical exposures, and specifically for NMP?
 - h. Have you received any customer feedback about NMP use?
- 7) Substitutes and alternatives:
- a. What alternative chemicals or methods have you tried, and what are the results?
 - b. What is the impact of dwell time for any substitutes, and are there any workarounds?
 - c. How do you learn about new chemicals, products, or methods for paint removal? (sales representative or materials, trade press, other?)
 - d. If you have tried or switched to alternative chemicals or methods, how long did that process take?
 - e. What resources or tools does you need to move to adopting alternatives to methylene chloride and NMP?
 - f. Chemical replacement:
 - i. What is important to you when considering chemical replacement or process change? (ease of use, flammability, efficacy, speed, price, other)
 - ii. Have you replaced chemicals, products, or processes in the past?
- 8) Regulatory options
- a. Which of the regulatory options presented today would you recommend?
 - b. Cost estimates: In your experience, are the cost estimates accurate for both options presented?
 - c. Can you think of ways to add flexibility to this rulemaking for your small business?
 - d. How do you learn about EPA regulations and what you should do to comply?
 - e. What is the best way to reach out to members of your industry?

Additional questions for paint remover users conducting renovations in residences, hotels, etc.:

- 1) General questions:
 - a. Who are your customers? (Individuals, hotels, apartment building owners, property managers, non-residential building owners, others)
 - b. How much do client preferences determine how paint is removed?
- 2) Bystander exclusion:
 - a. To what extent is paint removal conducted when few non workers are in the building?
 - b. Do you follow different work practices depending on whether a building is entirely vacant or if occupants are present during the renovation or at other times of the day?
 - c. What would the impact to your business be if residents or non-workers needed to leave the building for 24 hours after work was completed? How would clients react? Do they leave the building already?

Additional questions for furniture refinishers:

- 1) General questions:
 - a. What is the physical size of your business?
 - i. What is the square footage of the area in which paint removal is conducted?
 - ii. What else occurs in that area? (furniture repair, reupholstery, painting, administrative work, other)
 - b. How much do client preferences determine how paint or coatings are removed?
- 2) Risk reduction:
 - a. Do you have a ventilation system installed? If not, would it be feasible for you to install one?
 - b. Do you have a way to isolate the paint removal area from other types of work?
 - c. Do you have experience in air monitoring?
 - i. For what chemicals?
 - ii. At what levels?
 - d. Do you have experience with workers using personal protective equipment such as air-supplied respirators?

Contact information:

Nathaniel Jutras, RFA/SBREFA staff contact
EPA Office of Policy
202-564-0301
Jutras.Nathaniel@epa.gov